

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)
) CASE NO. 19 B 21160
Robin Thymes,) HON. LASHONDA A. HUNT
) CHAPTER 13
DEBTOR.)
)

NOTICE OF OBJECTION TO CLAIM 13-1

To: Trustee Marilyn O Marshall, 224 S. Michigan Ave. Suite 800, Chicago, IL 60604;
City of Chicago Department of Finance, c/o Arnold Scott Harris, 111 W Jackson Ste 600,
Chicago, IL 60604; Via Regular U.S Mail

Please take notice that on November 18, 2019, at 9:30 a.m., I shall appear before the Honorable LaShonda A. Hunt in Courtroom 719 in the Federal Dirksen Building, 219 S. Dearborn Street, Chicago, Illinois and present the attached objection and you may appear if you so choose.

PROOF OF SERVICE

The undersigned, an attorney, certifies that he transmitted a copy of this notice and the attached motion to the above-named creditors via regular U.S. Mail with postage prepaid from the mailbox located at 20 S. Clark Street, Chicago, IL 60603 on October 15, 2019.

/s/ Aaron Weinberg
Attorney for Debtor
The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603
(312) 913-0625

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
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OBJECTION TO CLAIM 13-1

NOW COMES Robin Thymes, Debtor, by and through Debtor's attorneys, The Semrad Law Firm, LLC, and hereby moves this Honorable Court to enter an Order regarding Claim 13-1; Debtors state the following:

1. That on July 29, 2019, the Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C.
2. This Honorable Court confirmed the Debtor's Chapter 13 Plan on September 16, 2019.
3. That on September 19, 2019, City of Chicago Department of Finance, filed a Proof of Claim, Claim 13-1, the total amount is \$3,198.72 for utility service including water and sewer. The secured claim amount is \$3,198.72. Please see Exhibit A for Claim 13-1 Proof of Claim.
4. Debtor is no longer the legal owner of the property commonly known as 11449 S Hermosa Ave, Chicago, IL 60643, since it was foreclosed upon.
5. Due to the circumstance's states above, Claim 13-1 should be paid as a general unsecured claim and not a secured claim.
6. Debtor respectfully requests this Honorable Court to Sustain Debtor's Objection to Claim 13-1 filed by City of Chicago Department of Finance.

7. Debtor has filed the instant case in good faith and is in a position to proceed with the Chapter 13 Plan of reorganization.

WHEREFORE, Robin Thymes, Debtor, respectfully requests this Honorable Court enter an Order:

- 1.) Sustaining Debtor's Objection to Claim 13-1, filed by City of Chicago Department of Finance;
- 2.) That the secured debt of Claim 13-1 should be paid as a general unsecured claim and not a secured claim; and
- 3.) For any such further relief as this Court deems fair and just.

Respectfully submitted,
/s/ Aaron Weinberg

Attorney for the Debtor
The Semrad Law Firm, LLC
20 S. Clark Street, 28th Floor
Chicago, IL 60603